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June 20, 2025

VIA ECF

MEMO ENDORSED

The Honorable Jessica G.L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Rapaport v. Iyer, et al.*, No. 24-cv-07439: Consent Request for Extension of Time to Respond to Amended Complaint

Dear Judge Clarke:

Counsel for Defendants write jointly pursuant to Your Honor's Rule 2.e to make this consent request for an extension of their June 27, 2025 deadline to respond to Plaintiff's amended complaint. Plaintiff has consented to the briefing schedule proposed in this letter.

This is Defendants' first request for an extension of time to respond to the amended complaint. Defendants Garrett and Iyer and Defendant Pallaki have previously sought and been granted an extension of time to respond to Plaintiff's original complaint. Dkt. Nos. 18 & 22; Dkt. Nos. 27 & 28. This is Defendant Epstein's first request for an extension in this action.

Defendants request a two-week extension of time, to July 15, 2025, to respond to the Complaint. The parties request that Plaintiff's opposition, if any, will be filed on or before August 21 and Defendants' replies will be due on September 17. The parties conferred and *pro se* Plaintiff has stated that he consents to the request and to the proposed briefing schedule.

Good cause exists to grant the requested relief. Defendants require the additional time to address Plaintiff's numerous amended allegations in his new complaint. In addition, certain Defendants are concurrently briefing responses to Plaintiff's Second Circuit appeal. The proposed briefing schedule will permit those Defendants to balance filings in both cases as well as preexisting travel plans.

Defendants respectfully request that this Court grant this consent request to extend their deadline to respond to the amended complaint until July 15, 2025 with any opposition due by August 21 and replies due September 17.

Respectfully Submitted,

Davis Wright Tremaine LLP

/s/ Jeremy Chase

Jeremy Chase

Nimra H. Azmi

Counsel for Defendant Professor Richard Epstein

SCHAERR | JAFFE LLP

Brian J. Field

*Counsel for Defendants Ajay Iyer and Zachary
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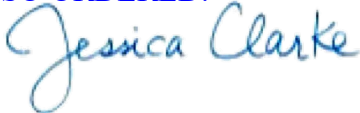
Seth L. Levine

Steven W. Kessler

Counsel for Defendant Mitchell K. Pallaki

Application GRANTED. The parties' proposed briefing schedule is hereby adopted as set forth above. The Clerk of Court is respectfully directed to terminate ECF No. 72.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: June 23, 2025
New York, New York